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9 UNITED STATES DISTRICT COURT

10 NORTHERN DISTRICT OF CALIFORNIA

11 SAN FRANCISCO DIVISION

12 GOOGLE LLC,

13 Plaintiff,

14 vs.

15 SONOS, INC.,

16 Defendant.

CASE NO. 3:20-cv-06754-WHA

Related to CASE NO. 3:21-cv-07559-WHA

**GOOGLE'S ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL
SHOULD BE SEALED**

I. INTRODUCTION

Pursuant to Civil Local Rule 79-5(f), Google LLC (“Google”) respectfully submits this Administrative Motion to Consider Whether Another Party’s Material Should Be Sealed in connection with its Brief Showing Cause Why the Court Should Not Enter Summary Judgment *Sua Sponte* of Validity of the ’885 Patent (“Brief Showing Cause”). Certain portions of the Brief Showing Cause and documents filed in support thereof contain information that Sonos and third-party Bose Corporation (“Bose”) may consider confidential pursuant to the Stipulated Protective Order (“Protective Order”) entered by this Court. Dkt. 94. Accordingly, Google seeks to file under seal the documents and information as listed below:

Document	Portions to Be Filed Under Seal	Designating Party
Brief Showing Cause	Portions highlighted in blue	Sonos
Exhibit 1 to the Declaration of Marc Kaplan in Support of Google’s Brief Showing Cause	Entire Document	Sonos
Exhibit 3 to the Declaration of Marc Kaplan in Support of Google’s Brief Showing Cause	Entire Document	Sonos
Exhibit 6 to the Declaration of Marc Kaplan in Support of Google’s Brief Showing Cause	Entire Document	Sonos
Exhibit 9 to the Declaration of Marc Kaplan in Support of Google’s Brief Showing Cause	Entire Document	Sonos
Exhibit 11 to the Declaration of Marc Kaplan in Support of Google’s Brief Showing Cause	Entire Document	Sonos
Exhibit 12 to the Declaration of Marc Kaplan in Support of Google’s Brief Showing Cause	Entire Document	Sonos & Bose

Materials and documents may be provisionally filed under seal pursuant to Civil Local Rule 79-5(f) when the document, or portions thereof, “has been designated as confidential by another party or non-party.” L.R. 79-5(f). Google has redacted the portions of the Brief Showing Cause highlighted in blue and submitted exhibits in support thereof under seal because information therein

1 may be considered “CONFIDENTIAL” and/or “HIGHLY CONFIDENTIAL—ATTORNEYS’
2 EYES ONLY” under the Protective Order by Sonos and/or Bose.

3 In compliance with Civil Local Rule 79-5(d) and (e), unredacted versions of the above listed
4 documents accompany this Administrative Motion and redacted versions of the above listed
5 documents have been filed publicly. In accordance with Local Rule 79-5(c)(3), Google has also
6 filed a Proposed Order herewith.

7
8 DATED: September 15, 2022

QUINN EMANUEL URQUHART & SULLIVAN,
LLP

9
10 By: /s/ Charles K. Verhoeven

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CERTIFICATE OF SERVICE

Pursuant to the Federal Rules of Civil Procedure and Local Rule 5-1, I hereby certify that, on September 15, 2022, all counsel of record who have appeared in this case are being served with a copy of the foregoing via the Court's CM/ECF system and email.

DATED: September 15, 2022

By: /s/ Charles K. Verhoeven
Charles K. Verhoeven